

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

In Re GOOGLE, INC. COOKIE
PLACEMENT CONSUMER PRIVACY
LITIGATION

Civ. No.: 12-MD-2358

Judge Eduardo C. Robreno

DECLARATION OF MICHELLE M. LA COUNT
REGARDING NOTICE AND SETTLEMENT
ADMINISTRATION

DECLARATION OF MICHELLE M. LA COUNT REGARDING NOTICE ADMINISTRATION

I, Michelle M. La Count, hereby declare and state as follows

1. I am a Project Director employed by Epiq Class Action & Claims Solutions, Inc. (“Epiq”). I have more than 17 years of experience working in the legal field of which 14 years have been dedicated to settlement administrations.
2. Epiq was established in 1968 as a client services and data processing company. Epiq has administered bankruptcies since 1985 and settlements since 1993. Epiq has routinely developed and executed notice programs and administrations in a wide variety of mass action contexts including settlements of consumer, antitrust, products liability, and labor and employment class actions, settlements of mass tort litigation, Securities and Exchange Commission enforcement actions, Federal Trade Commission disgorgement actions, insurance disputes, bankruptcies, and other major litigation. Epiq has administered more than 4,500 settlements, including some of the largest and most complex cases ever settled. Epiq’s class action case administration services include administering notice requirements, designing direct-mail notices, implementing notice fulfillment services, coordinating with the

¹ All capitalized terms not otherwise defined in this document shall have the same meanings ascribed to them in the Agreement.

United States Postal Service (“USPS”), developing and maintaining notice websites and dedicated telephone numbers with recorded information and/or live operators, processing exclusion requests, objections, claim forms and correspondence, maintaining class member databases, adjudicating claims, managing settlement funds, and calculating claim payments and distributions. As an experienced neutral third-party administrator working with settling parties, courts, and mass action participants, Epiq has handled hundreds of millions of notices, disseminated hundreds of millions of emails, handled millions of phone calls, processed tens of millions of claims, and distributed hundreds of billions in payments.

3. Hilsoft Notifications (“Hilsoft”), a firm that specializes in designing, developing, analyzing, and implementing, large-scale legal notification plans. Hilsoft is a business unit of Epiq Class Action & Claims Solutions, Inc. (“Epiq”).
4. The statements of fact in this declaration are based on my personal knowledge and information provided to me by my colleagues in the ordinary course of business, and if called on to do so, I could and would testify competently thereto.
5. This declaration will advise the Parties and the Court for dissemination of the Settlement Notice Plan (“Notice”), final exclusion request totals, objections received, and correspondence information for the settlement in *Google, Inc. Cookie Placement Consumer Privacy Litigation*, Civ. No.: 12-MC-2358, District of Delaware.
6. Epiq was appointed the Settlement Administrator pursuant to the Court’s Order granting approval of the parties proposed for re-issuing notice (the “Order”) entered February 24, 2022. I submit this Declaration in order to advise the Parties and the Court regarding the

implementation of the notice plan and to report on requests for exclusion and objections postmarked by the July 7, 2022, deadline in accordance with the Order.

NOTICE SUMMARY

7. On February 24, 2022, the Court approved the proposed plan for re-issuing notice. Hilsoft designed the notice campaign in accordance the Order granting preliminarily approval of the class action settlement and the supplement thereto on October 15, 2021 (“Preliminary Approval Order”). In the Preliminary Approval Order, the Court certified the following Settlement Class:

All persons in the United States of America who used the Apple Safari or Microsoft Internet Explorer web browsers and who visited a website from which Doubleclick.net (Google’s advertising serving service) cookies were placed by the means alleged in the Complaint.

8. After the Order was entered, Epiq began to implement the notice campaign. This declaration will detail the notice activities undertaken. This declaration will also discuss the administration activity to date.

The Media Plan

9. The Media Plan included various forms of notice, which utilized a national consumer print publication, internet banner advertising, social media targeting Apple Safari and Microsoft Internet Explorer web users in English and Spanish. Each notification had a link to the website where the long form notice was available along with pertinent dates, deadlines, and a summary of Class Members rights.
10. The campaign ran for a period of (6) six weeks, beginning March 24, 2022, and continuing until May 4, 2022.

National Consumer Publication

11. The Notice included a highly visible national print program. A 1/3-page notice appeared once on April 15, 2022, weekly magazine *People*, a leading consumer publication in the United States. *People* magazine has circulation of 3.4 million and a readership of over 28 million.
12. The Notice in *People* magazine contained the material terms of the Settlement to potential Class Members, including the relief provided under the Settlement, the time period and location for the Fairness Hearing, the procedures and deadlines for excluding from the Settlement, or submitting objections to the Settlement, and an explanation that Class Members would be bound by any final judgement in this case if they did not opt-out of the Settlement. The Notice included the contact information to both Class Counsel, and the website address, GoogleCookiePlacementPrivacySettlement.com.
13. The Publication Notice is included as **Exhibit 1**.

Digital Banner Notice

14. Internet advertising has become a standard component in legal notice programs. The internet has proven to be an efficient and cost-effective method to target and provide measurable reach of persons covered by a settlement.
15. Banner Notices were booked on the *Verizon (Yahoo) Audience*¹ ad networks. Banners ran on desktop, mobile and tablet devices and were targeted to adults 25+. Additionally, people

¹ Verizon Audience Network is now known as Yahoo Audience Network.

who clicked on a Banner Notice and visited the website were retargeted with additional Banner Notices.

16. The Notice also included advertising on social media, which consisted of newsfeed and right-hand column ads on *Facebook*. In addition, newsfeed ads were placed on *Instagram* and *Reddit*. *Facebook* is the leading social networking site in the United States and combined with *Instagram* covers over 200 million users in the United States. The social news discussion website *Reddit* is one of the top 10 most visited websites in the United States.

17. The Banner Notice examples are included as **Exhibit 2**.

18. The Banner Notice campaign, including display and social ads, ran from March 24, 2022, through May 4, 2022, nationwide. Clicking on the Banner Notices linked the reader to the settlement website, where they can easily file a claim for benefits online, request a paper claim form and obtain detailed information about the Settlement. Combined, a total of 429,292,485 impressions ran.

19. The Banner Notice campaign data is attached as **Exhibit 3**.

CLASS COMMUNICATION

20. Epiq received limited communication from Class Members with only two requests for copies of the long form notice, which were responded to by US Mail and included a copy of the requested long form notice.

21. There were a total of four pieces of additional correspondence. In all instances Epiq

responded with a letter and a copy of the Notice as the questions posed were answered in the long form notice itself.

POSTAL MAILING ADDRESS

22. A post office box for correspondence about the Settlement were also established and maintained, to allow Settlement Class Members to contact the Claims Administrator by mail with any specific requests or questions.

SETTLEMENT WEBSITE

23. In accordance with the Order Epiq designed and made public a Settlement website, GoogleCookiePlacementPrivacySettlement.com and launched the site on March 23, 2022. The website included important information regarding the class action description, important dates, and contact information. Furthermore, important documents were on the site and downloadable. Those included the long form notice and exclusion request form, among others. The long form notice contained the material terms of the Settlement to potential Class Members, including relief provided under the Settlement, the date, time and place of the Fairness Hearing, the procedures and deadlines for opting out of the Settlement and submitting objections to the Settlement, as well as an explanation that Class Members would be bound by any final judgment in this case if they did not opt out of the Settlement. Class Members also had access to Court documents such as; Motion for Preliminary Approval, Preliminary Approval Order, Order Granting Proposed Plan, and the Settlement Agreement.

24. As of August 7, 2022, the Settlement website has received 92,659 page hits, resulting in 75,325 unique sessions.

REQUESTS FOR EXCLUSION

25. Pursuant to Sections 8.1-8.3 of the Agreement, any Class Member may have sought to be excluded from the Settlement by submitting a request for exclusion to the Settlement Administrator.

26. The reissued notice period did not negate the 50 timely and 11 late exclusion requests that were received during the initial notice period.

27. Between March 24, 2022, the start of the reissued notice campaign, through August 3, 2022, there were 40 unique reissued notice period requests for exclusion. Of those, 39 were postmarked on or before the exclusion request deadline set by the Court of July 7, 2022.

28. One of the requests for exclusion received during the reissued notice period was not signed and thus fails to meet the criteria for a complete exclusion request, and;

29. One request was postmarked after the exclusion request deadline leaving 38 complete, timely requests for exclusion received during the reissued notice period

30. Attached as **Exhibit 4** is a list of all timely, complete exclusion requests along with any incomplete or late requests, inclusive of both the original notice period and the reissued notice period.

OBJECTIONS

31. Pursuant to Sections 9.1-9.4 of the Agreement, any Class Member who wanted to object to the Settlement had to file their reason to objecting with the Clerk of the Court, Counsel, and the Settlement Administrator on or before July 7, 2022.
32. Epiq has received one timely submitted objection and no untimely objections.
33. A copy of the objection is attached as **Exhibit 5**.

COST OF NOTICE ADMINISTRATION

34. The combined, approximate cost to provide notice and handle the claims administration is currently estimated at \$279,906.71. As of July 19, 2022, Epiq has invoiced \$263,188.50 for notice and claims administration. All costs are subject to the Service Contract under which Epiq will be retained as the Settlement Administrator, and the terms and conditions of that agreement.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed on August 8, 2022, at Green Bay, Wisconsin.



Michelle M. La Count

EXHIBIT 1

If You Used Apple Safari Or Internet Explorer Browsers, You Could Be Affected By A Class Action Settlement.

What Is This Lawsuit About?

A class action settlement has been reached *In Re: Google Inc. Cookie Placement Consumer Privacy Litigation, Case No. 12-MD-2358 (ER)*. Plaintiffs allege that, in violation of federal and state laws, Google placed third-party tracking cookies on browsers that visited websites containing Google ads by circumventing browser settings that were set to block such cookies. Google denies all allegations of wrongdoing.

The Settlement Agreement provides for substantial injunctive relief for Settlement Class Members, including assurances from Google regarding its remediation efforts. Google has also agreed to pay \$5.5 million to be distributed to various non-profit or educational institutions that agree to devote the funds to promote public awareness, research, and initiatives related to the security or privacy of Internet browsers.

This Settlement Agreement was originally announced in 2016. You may have previously received a notice of this settlement at that time. At the direction of the Court, a second notice and opt-out period are now being provided to Class Members because the Court has approved a revised process for selecting the institutions that will receive settlement funds.

Are You Affected?

If you used a Safari or Internet Explorer browser in 2011-2012 with the browser cookie settings set, by default or by choice, either to accept only cookies from “visited” sites or to block cookies from “third parties and advertisers,” and you visited a non-Google website that displayed ads from doubleclick.net (Google’s advertising serving service), and a cookie from doubleclick.net was placed on your browser as a result of that visit, you may be a Class Member.

What Are Your Rights And Options?

Class Members may request exclusion by sending a completed “Request for Exclusion” form to the Administrator postmarked by **July 7, 2022**. If you submit a timely Request for Exclusion you will not be affected by the settlement. If you do not exclude yourself from the settlement, you will be bound by its terms and will release any and all claims.

If you wish to comment or object in writing to any aspect of the proposed Settlement, you may do so by filing your comments or objections with the Court and sending them by U.S. Mail to the Parties no later than **July 7, 2022**.

When Is The Fairness Hearing?

The Court will schedule a final fairness hearing at a date to be determined after September 9, 2022, in the Courtroom of the Honorable Eduardo C. Robreno, Senior Judge of the U.S.D.C., sitting by designation in the District of Delaware, at J. Caleb Boggs Federal Building, 844 N. King Street, Wilmington, DE 19801. At this hearing, the Court will consider if the Settlement should be granted final approval. The Court previously approved Class Counsel’s request for attorneys’ fees, expenses, and Class Representative incentive awards. Although you may attend the hearing or send your own attorney at your own expense, you are not required to do so.

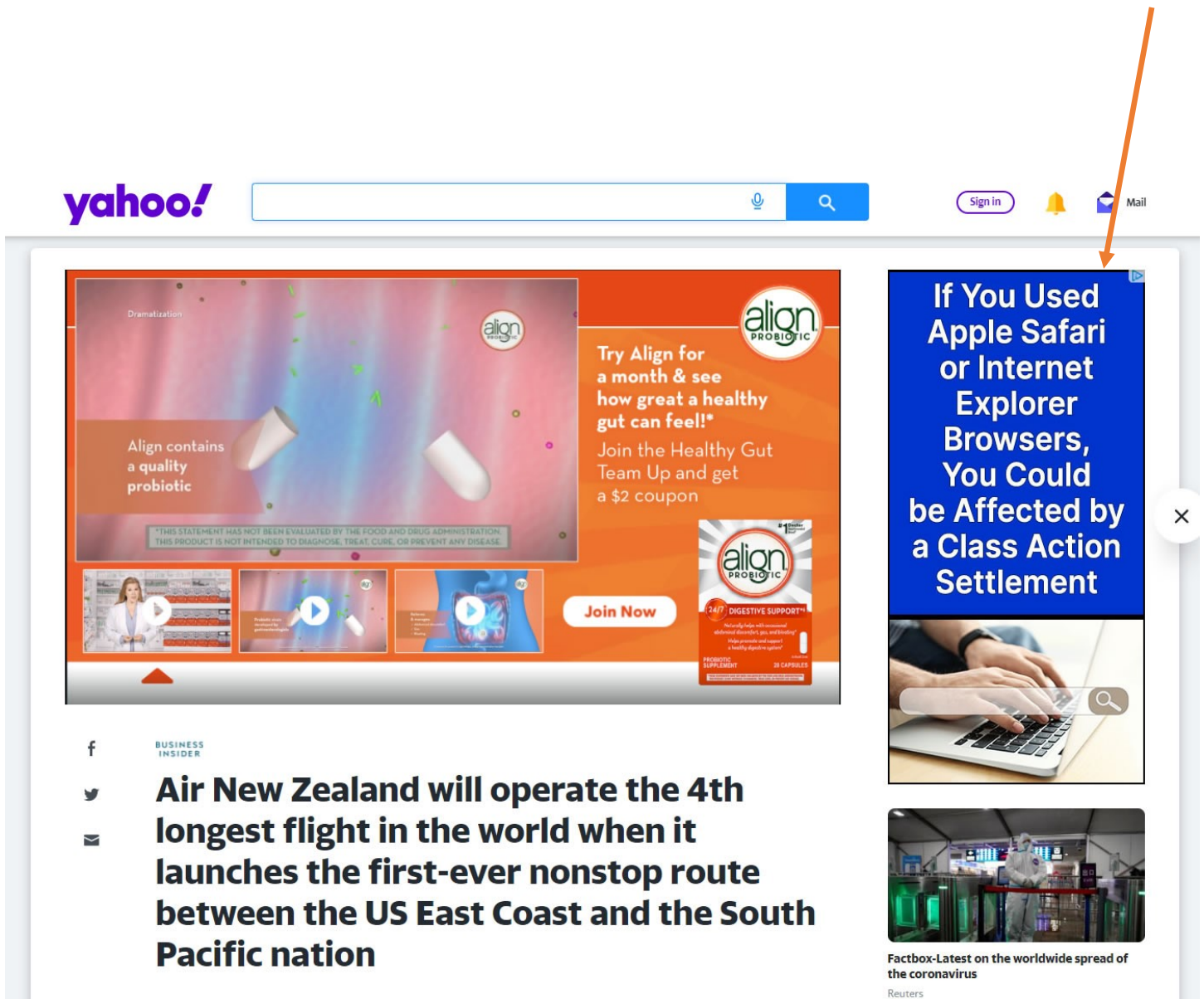
Where Can I Get More Information?

This notice is a summary only. If you need further information, please view the Long Form Notice at GoogleCookiePlacementPrivacySettlement.com or please contact Class Counsel, Brian R. Strange, Strange LLP, 12100 Wilshire Blvd., Ste. 420, Los Angeles, CA 90025; and/or James P. Frickleton, Bartimus Frickleton Robertson Rader, 4000 W. 114th Street, Suite 310, Leawood, KS 66211.

PLEASE DO NOT CONTACT THE COURT.

EXHIBIT 2

Yahoo display 300 x 600 px.



The screenshot shows the Yahoo! homepage interface. At the top left is the "yahoo!" logo. To its right is a search bar with a microphone icon and a magnifying glass icon. Further right are links for "Sign in", a notification bell, and a "Mail" link. Below the header, the main content area is divided into several sections. On the left, there is a large advertisement for "align PROBIOTIC". The ad features a pink and orange background with a diagram of a human gut. Text on the ad includes "Dramatization", "Align contains a quality probiotic", "Try Align for a month & see how great a healthy gut can feel!*", "Join the Healthy Gut Team Up and get a \$2 coupon", and a "Join Now" button. Below the main ad are three smaller video thumbnails. To the right of the ad is a blue banner with white text: "If You Used Apple Safari or Internet Explorer Browsers, You Could be Affected by a Class Action Settlement". Below this banner is a photo of hands typing on a laptop. Further down is a "Factbox-Latest on the worldwide spread of the coronavirus" with a photo of a person in a white protective suit. At the bottom left, there is a "BUSINESS INSIDER" logo and a headline: "Air New Zealand will operate the 4th longest flight in the world when it launches the first-ever nonstop route between the US East Coast and the South Pacific nation".

yahoo!

Sign in

Mail

align PROBIOTIC

Dramatization

Align contains a quality probiotic

Try Align for a month & see how great a healthy gut can feel!*

Join the Healthy Gut Team Up and get a \$2 coupon

Join Now

align PROBIOTIC

24/7 DIGESTIVE SUPPORT™

Align Probiotic

If You Used Apple Safari or Internet Explorer Browsers, You Could be Affected by a Class Action Settlement

Factbox-Latest on the worldwide spread of the coronavirus

Reuters

BUSINESS INSIDER

Air New Zealand will operate the 4th longest flight in the world when it launches the first-ever nonstop route between the US East Coast and the South Pacific nation

Yahoo display 728 x 90 px.

The screenshot displays the Yahoo Sports homepage. At the top is a dark navigation bar with links for HOME, MAIL, NEWS, FINANCE, SPORTS, ENTERTAINMENT, LIFE, SEARCH, SHOPPING, YAHOO PLUS, and MORE... Below this is the 'yahoo!sports' logo and a search bar. To the right of the search bar are 'Sign in' and 'Mail' buttons. The main content area features three article teasers, each with a headline, a sub-headline, and a small image. An orange arrow points from the top right towards the bottom right of the page, highlighting a specific area. Below the article teasers is a blue banner advertisement with white text that reads: 'If You Used Apple Safari or Internet Explorer Browsers, You Could be Affected by a Class Action Settlement'. To the right of the text is a small image of hands typing on a laptop. Below the banner is a section titled '44 Comments' with a '429 Viewing' indicator. A welcome message for the comments section follows, stating: 'Welcome to Yahoo comments! Please keep conversations courteous and on-topic. To foster productive and respectful conversations, you may see comments from our Community Managers, who will be designated by a "Yahoo Staff" or "Staff" label. See our [community guidelines](#) for more information.'

HOME MAIL NEWS FINANCE SPORTS ENTERTAINMENT LIFE SEARCH SHOPPING YAHOO PLUS MORE...

yahoo!sports

Rodgers and Dak Prescott are losing the offseason
Yahoo Sports · 6 min read

Ron DeSantis' targeting of Penn swimmer Lia Thomas is a transparently cheap political ploy
Yahoo Sports · 4 min read

Bulls are winless against NBA's top teams, but could still be dangerous in playoffs
Yahoo Sports · 6 min read

If You Used Apple Safari or Internet Explorer Browsers, You Could be Affected by a Class Action Settlement

44 Comments 429 Viewing

Welcome to Yahoo comments! Please keep conversations courteous and on-topic. To foster productive and respectful conversations, you may see comments from our Community Managers, who will be designated by a "Yahoo Staff" or "Staff" label. See our [community guidelines](#) for more information.

Yahoo display 300 x 250 px.

The screenshot displays the Yahoo! homepage layout. At the top is the Yahoo! logo and a search bar. Below the logo are navigation tabs for Politics, US News, Celebrity, Lifestyle, Sports, Business, and Entertainment. The main content area features several news articles with accompanying images. On the right side, there is a weather section, a scoreboard for various cities, a daily horoscope for Aries, and a large advertisement for a class action settlement. An orange arrow points from the bottom left towards the bottom right of the page.

Ad Bonvoyaged
Netflix Cancels Another Round Of Great Shows
Unfortunately, these shows won't be returning anytime soon..

Celebrity Fox News
Sports Illustrated Swimsuit model Nina Agdal poses completely nude on Instagram: 'When you got it... flaunt it!'
The Sports Illustrated Swimsuit model took to Instagram and posted a completely nude mirror selfie.

U.S. Merced Sun-Star
Wife of Valley cheese magnate arraigned on DUI charges after alleged 125 mph crash in Maserati
Authorities said she was driving a Maserati which crashed into numerous vehicles.

Politics Raleigh News and Observer
In Jackson hearing, Tillis declines to join his repugnant GOP colleagues

Yahoo News Video
Sen. Durbin said Republicans had used SCOTUS hearing to 'showcase talking points for th...

Yahoo News
Jackson defends herself against Republican attacks: 'Nothing could be further from the truth'

Lifestyle MarketWatch
'Enough touchscreen tipping already! I'm over it': Two years into the COVID-19 pandemic, do I have to tip for coffee, ice cream an...
'The online-order service request a tip. Am I supposed to now tip before I pick up my own food?'

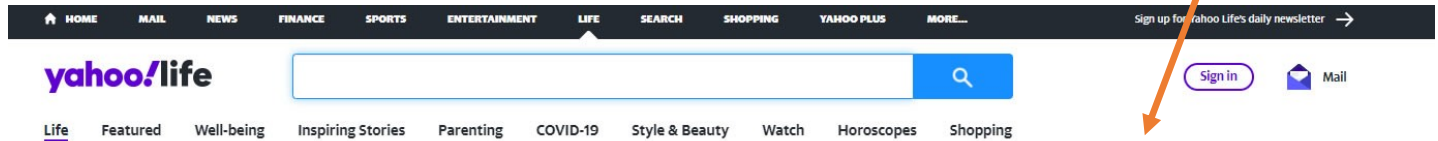
Ad TheDelite

Scoreboard Trending
Yesterday Today Tomorrow
Phoenix 9:00 PM EDT
Denver
Cleveland 7:30 PM EDT
Toronto
Washington 8:00 PM EDT
Milwaukee
More scores »

Daily Horoscope Aries
March 24 - Aries - You've got to take the lead today. Things are sure to look a lot better for you once you get moving. In fact, all you really have to do is suggest...
See more »

If You Used Apple Safari or Internet Explorer Browsers, You Could be Affected by a Class Action Settlement

Yahoo display 970 x 250 px.



yahoo/life

It may be time to double check your computer's privacy settings

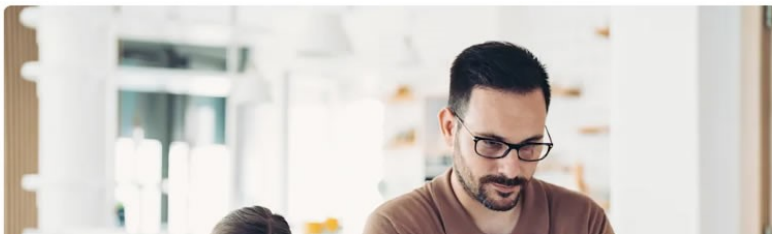


Erica Gerald Mason




February 15, 2022 · 4 min read




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Yahoo display 300 x 600 px. SPANISH


yahoo!  [Sign in](#)   Mail


 **How Savvy Investors Pay for Healthcare in Retirement**
Fisher Investments [READ MORE](#) AD

AXIOS
The Parrotheads are changing what it means to retire



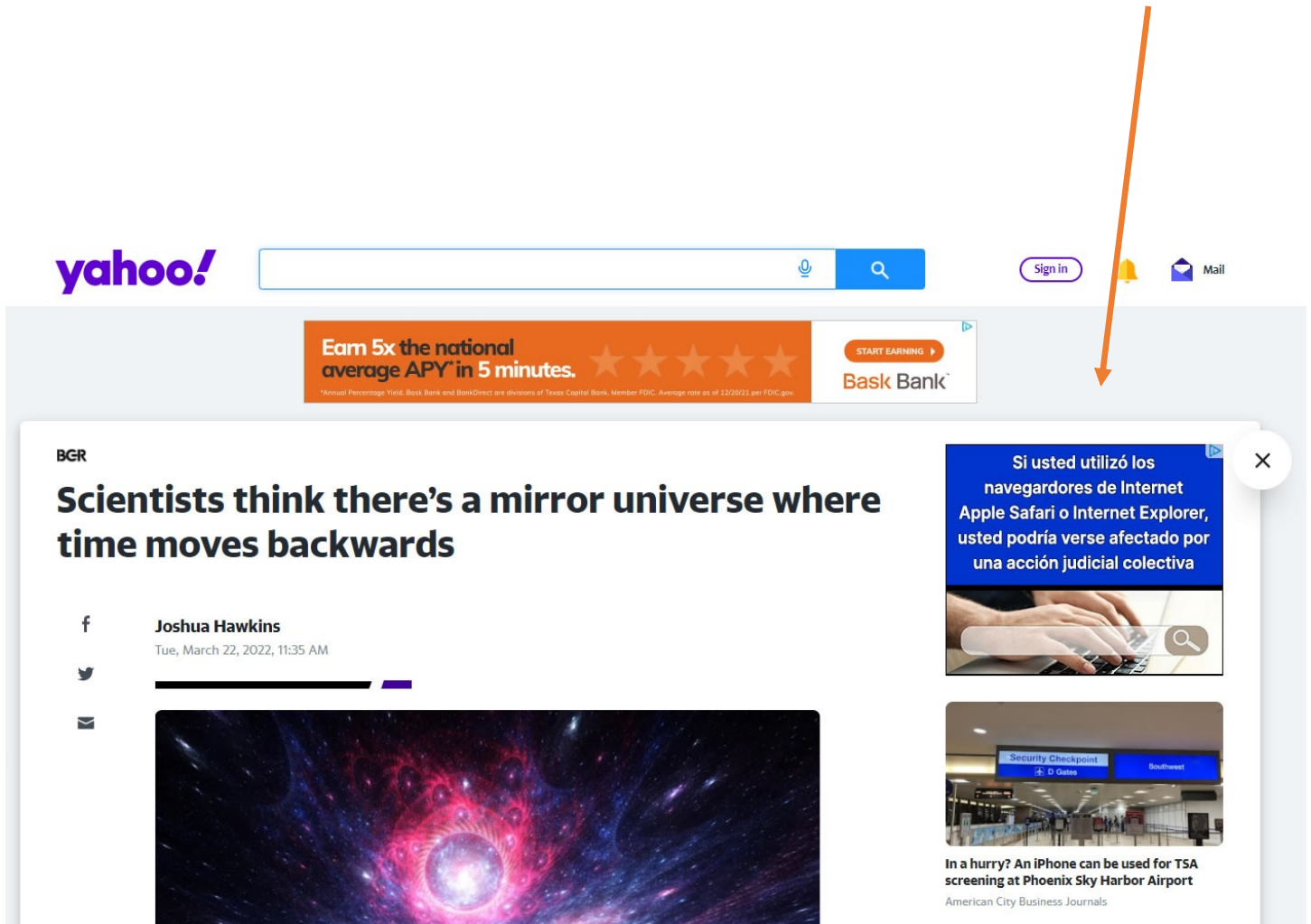
Si usted utilizó los navegadores de Internet Apple Safari o Internet Explorer, usted podría verse afectado por una acción judicial colectiva








Yahoo display 300 x 250 px. SPANISH



The screenshot shows the Yahoo! homepage in Spanish. At the top left is the "yahoo!" logo. To its right is a search bar with a microphone icon and a search icon. Further right are links for "Sign in", a notification bell, and a "Mail" icon. Below the search bar is a Bask Bank advertisement with the text "Earn 5x the national average APY* in 5 minutes." and a "START EARNING" button. An orange arrow points from the top right towards this advertisement. Below the advertisement is a main article from BGR titled "Scientists think there's a mirror universe where time moves backwards" by Joshua Hawkins, dated Tue, March 22, 2022, 11:35 AM. The article features a large image of a colorful, swirling galaxy. To the right of the article is a sidebar with two items: a blue box with white text warning users of a collective lawsuit if they use Internet Explorer or Apple Safari, and a photo of an airport security checkpoint with the headline "In a hurry? An iPhone can be used for TSA screening at Phoenix Sky Harbor Airport" from American City Business Journals.

yahoo!



Sign in


Earn 5x the national average APY* in 5 minutes.  START EARNING Bask Bank

BGR


Scientists think there's a mirror universe where time moves backwards


f Joshua Hawkins
Tue, March 22, 2022, 11:35 AM






Si usted utilizó los navegadores de Internet Apple Safari o Internet Explorer, usted podría verse afectado por una acción judicial colectiva






In a hurry? An iPhone can be used for TSA screening at Phoenix Sky Harbor Airport
American City Business Journals


Yahoo display 728 x 90 px. SPANISH


yahoo!  [Sign in](#)   Mail


Si usted utilizó los navegadores de Internet Apple Safari o Internet Explorer, usted podría verse afectado por una acción judicial colectiva 


Miami Herald

Is your iPhone's battery draining faster after update? Here's what Apple says to do



GILDAN MEN'S UNDERWEAR
Comfort from head to toe.
[Shop now](#)
available at **amazon** 

Security Checkpoint
D Gates Southwest
In a hurry? An iPhone can be used for TSA screening at Phoenix Sky Harbor Airport
American City Business Journals 



Yahoo display 970 x 250 px. SPANISH



The screenshot shows the Yahoo Finance website in Spanish. At the top is a navigation bar with links for HOME, MAIL, NEWS, FINANCE, SPORTS, ENTERTAINMENT, LIFE, SEARCH, SHOPPING, YAHOO PLUS, and MORE. Below this is the 'yahoo!finance' logo and a search bar with the placeholder text 'Search for news, symbols or companies'. To the right of the search bar are links for 'Sign in' and 'Mail'. Below the search bar is a secondary navigation bar with links for Finance, Watchlists, My Portfolio, Cryptocurrencies, Yahoo Finance Plus, Screeners, Markets, News, Personal Finance, Videos, and Yahoo U. The main content area features a large blue banner with white text that reads: 'Si usted utilizó los navegadores de Internet Apple Safari o Internet Explorer, usted podría verse afectado por una acción judicial colectiva'. To the right of the text is an image of hands typing on a laptop keyboard. Below the banner is a section for market indices: S&P 500 (4,475.32, +19.08 (+0.43%)), Dow 30 (34,519.89, +161.39 (+0.47%)), Nasdaq (13,929.93, +7.32 (+0.05%)), Russell 2000 (2,057.19, +4.98 (+0.24%)), and Crude Oil (112.47, -2.46 (-2.14%)). To the right of these indices is a link to 'U.S. markets close in 5 hours 37 minutes'. Below the market indices is an orange banner with the headline 'JOBS: New weekly jobless claims hit the lowest level since 1969' and a sub-headline 'Continuing claims also fell further to reach 1.35 million — the least since January 1970'. To the left of the headline is a small image of a document with a red checkmark.

HOME MAIL NEWS FINANCE SPORTS ENTERTAINMENT LIFE SEARCH SHOPPING YAHOO PLUS MORE y/finance+ Try it free

yahoo!finance Search for news, symbols or companies Sign in Mail

Finance Watchlists My Portfolio Cryptocurrencies Yahoo Finance Plus Screeners Markets News Personal Finance Videos Yahoo U ...

Si usted utilizó los navegadores de Internet Apple Safari o Internet Explorer, usted podría verse afectado por una acción judicial colectiva

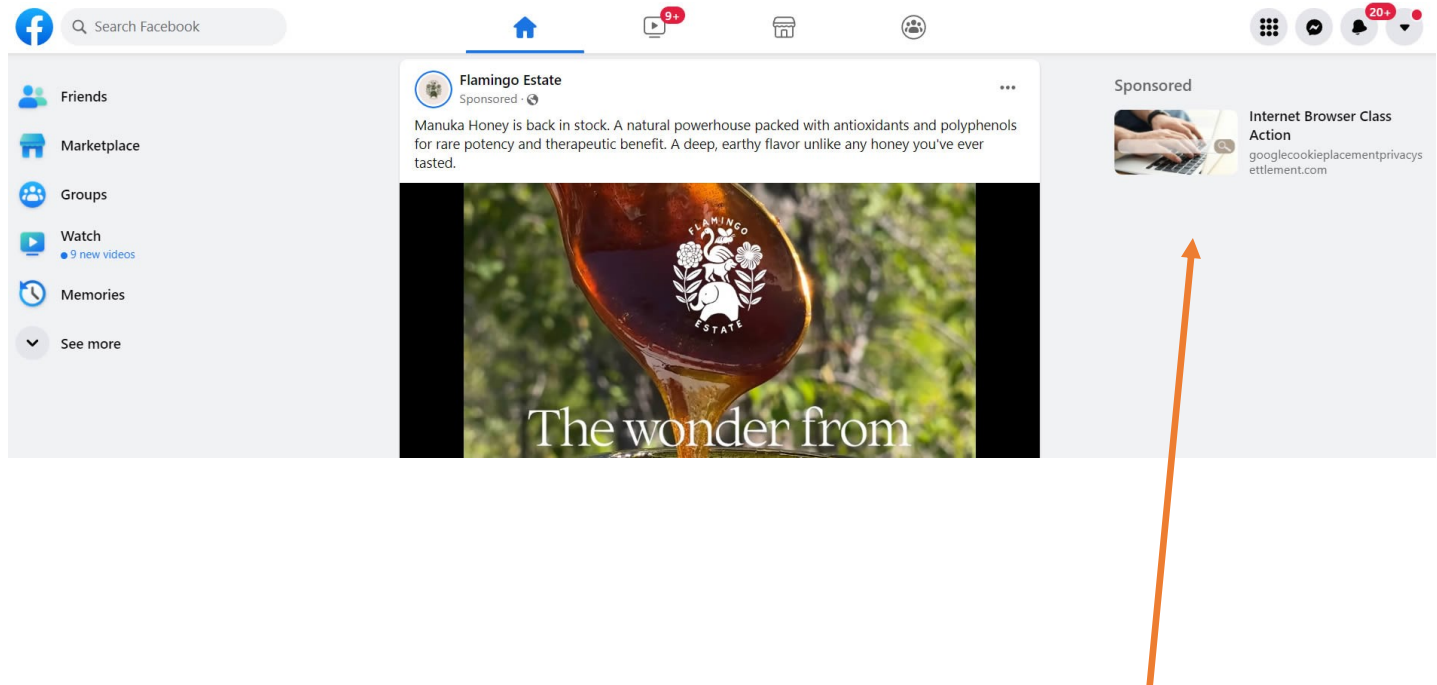
S&P 500 4,475.32 +19.08 (+0.43%) Dow 30 34,519.89 +161.39 (+0.47%) Nasdaq 13,929.93 +7.32 (+0.05%) Russell 2000 2,057.19 +4.98 (+0.24%) Crude Oil 112.47 -2.46 (-2.14%) U.S. markets close in 5 hours 37 minutes

JOBS: New weekly jobless claims hit the lowest level since 1969 Continuing claims also fell further to reach 1.35 million — the least since January 1970

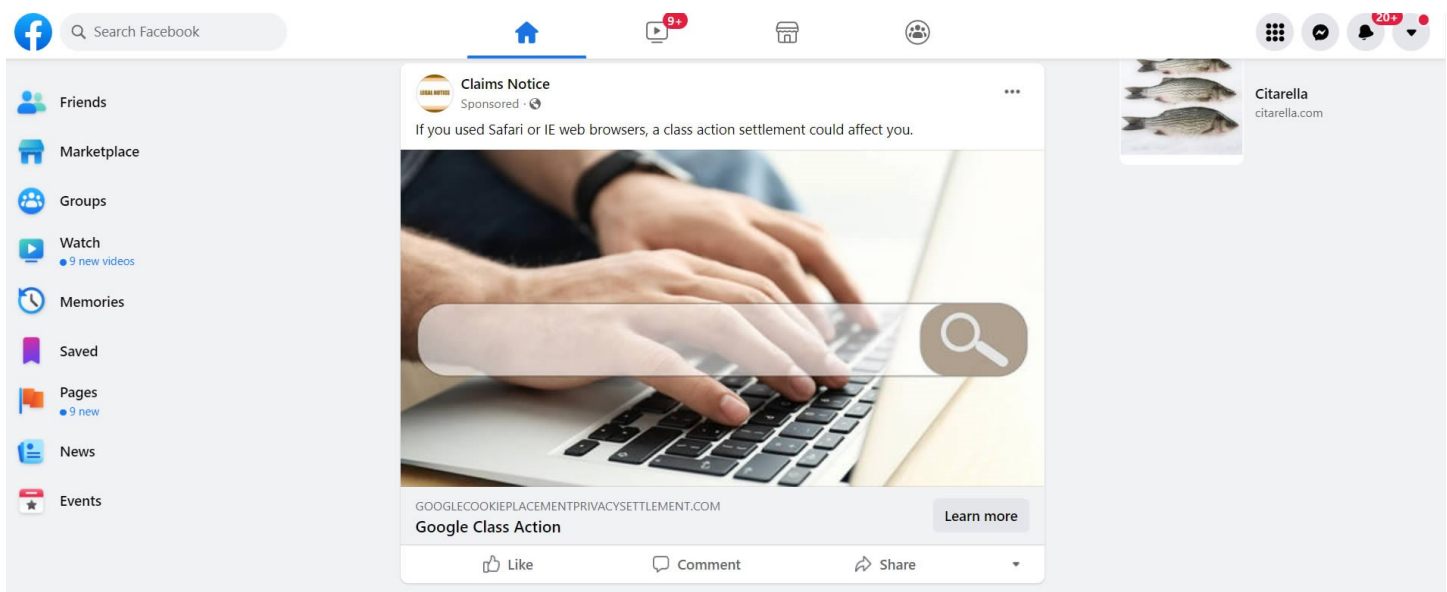
REUTERS

Nikola shares jump as it starts manufacturing electric trucks

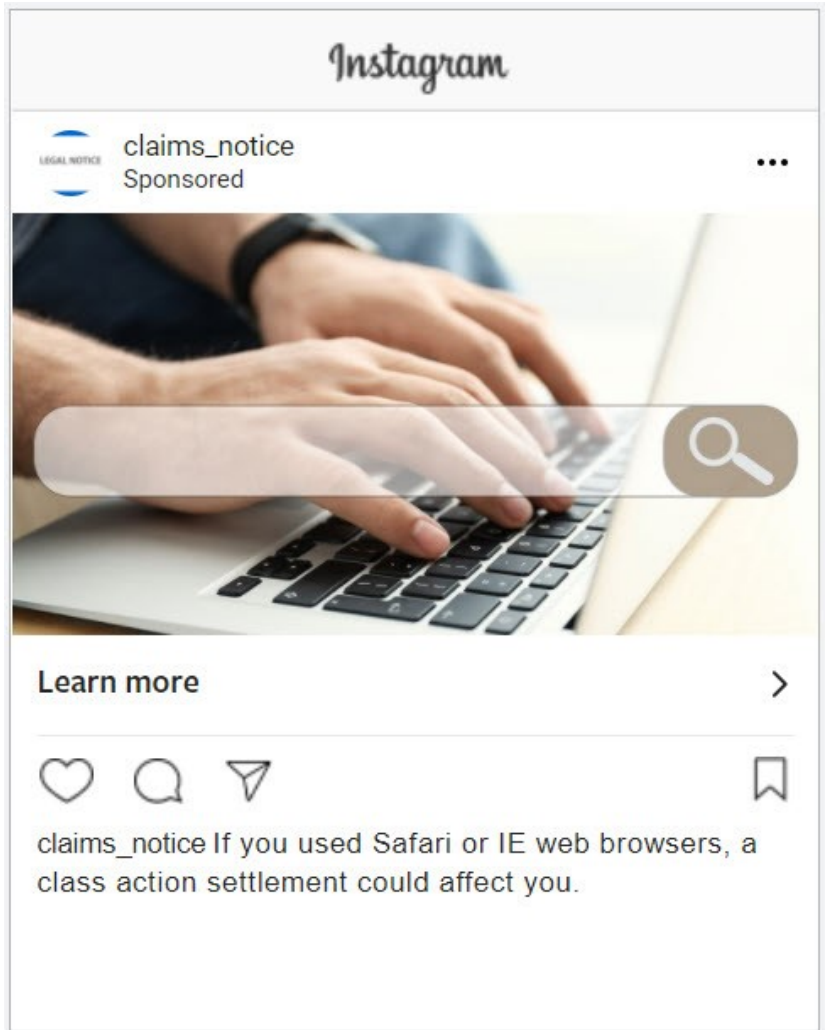
Facebook display



Facebook Newsfeed



Instagram



Reddit

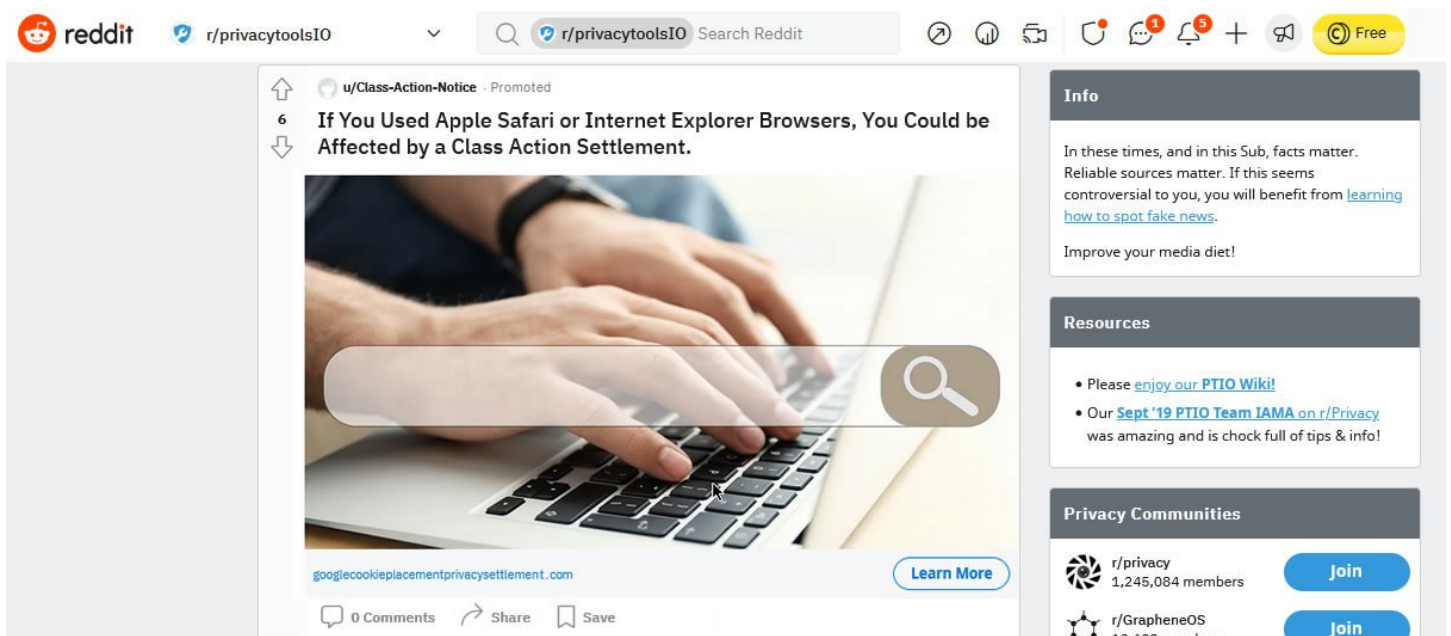


EXHIBIT 3

Google Cookie Placement Consumer Privacy Litigation

Notice Plan Proposal

Proprietary and Confidential

October 22, 2021



Notice plan reaches 70% of the target audience, an average frequency of 2.8 times each.

Detailed Media Plan

Print	Circulation	Insertions	Distribution	Frequency	Ad Size	Cost
People	3,400,000	1	National	Weekly	1/3 Page B&W	
Total Estimated Print:						\$67,395

Digital Base Plan (Display & Social)	Duration	Impressions*	Distribution	Target	Ad Size	Cost
- Notice on desktop, mobile and tablet devices. - Remarket to Adults who have visited settlement website.						
Verizon (Yahoo!) Audience Network	6 weeks	165,000,000	National	Adults 25+ (English and Spanish language)	728x90, 300x250, 300x600 & 970x250	
Facebook	6 weeks	90,000,000	National	Adults 25+	Newsfeed & Right Hand Column	
Facebook	6 weeks	70,000,000	National	Adults 25+ with interests in Internet Privacy, Information Privacy and/or Browser Security	Newsfeed & Right Hand Column	
Instagram	6 weeks	40,000,000	National	Adults 25+	Newsfeed	
Instagram	6 weeks	30,000,000	National	Adults 25+ with interests in Internet Privacy, Information Privacy and/or Browser Security	Newsfeed	
Reddit	6 weeks	21,000,000	National	Adults 25+ who have interacted with the subreddits r/privacy, r/privacytoolsio, r/cybersecurity and/or r/privacyguides	Reddit Feed Ads	
Total Estimated Digital:		416,000,000				\$188,631

Plan Total: ^ \$256,026

*Impression inventory at time of booking may vary slightly.

^Expert and professional time to be billed separately.

Estimated Program Duration (including lead time after Preliminary Approval): Approximately 8 weeks

Quote valid for 60 days from issue date. All advertising is subject to publisher's approval and availability at the time of the buy.



Hilsoft Notifications
10300 SW Allen Blvd.
Beaverton, OR 97005
503.350.5800
www.hilsoft.com



comScore target - A18+
Did not weight; class is inherently
online

comScore August 2021

raw reach	raw GRP
66.51%	2350
Print reach:	10.60% A25+
Print GRP:	10.6
MRI Simmons DB 2021	
Total Reach:	69.65%
Average Frequency:	3.9

Secondary R/F test	raw reach A25+	raw GRP
Desktop Comscore	44.58%	111.41
Mobile Comscore	39.81%	77.92
Digital Reach	66.64%	
Total Reach:	70.18%	
Average Frequency:	2.8	

Gross Cost	Net Cost	Actual Ad Size	Run Date	Page	Have Tearsheet?
\$68,743.53	\$58,432.00		4/25 issue; on sale 4/15	30	Yes

Gross Cost	Net Cost	CPM	Run Dates	Have Screenshot?	Impressions Run	Total Clicks
\$80,558.82	\$68,475.00	\$0.4150	3/24 - 5/4, 2022	Yes	169,838,710	42,231
\$36,264.71	\$30,825.00	\$0.3425	3/24 - 5/4, 2022	Yes	91,243,599	12,372
\$28,199.38	\$23,969.47	\$0.3424	3/24 - 5/4, 2022	Yes	72,651,129	9,831
\$17,623.53	\$14,980.00	\$0.3745	3/24 - 5/4, 2022	Yes	43,055,878	5,855
\$13,208.56	\$11,227.27	\$0.3742	3/24 - 5/4, 2022	Yes	31,046,716	4,239
\$12,776.47	\$10,860.00	\$0.517	3/24 - 5/4, 2022	Yes	21,456,453	4,925
					429,292,485	79,453

EXHIBIT 4

Google Cookie Placement Consumer Privacy Litigation

2016

2022

Exclusion Request

Tracking Number	CLASS MEMBER NAME	STATUS	Tracking Number	RE-NOTICE CLASS MEMBER NAME	STATUS
59E7A68549	CHARLES E RICHARDSON	Incomplete	1	SHAWN HOLMES	Incomplete
E2D29C8163	UNITA FAY MITCHELL	Incomplete	2	RAUL MENDOZA	Complete
B4E535D02C	AKIKO DUNN	Complete	3	ERNEST ROBINSON	Complete
C395C9BF85	ALAN LANSING	Complete	4	JOHANNA R SILVA	Complete
609F01BCE3	ALEKSANDR Y SHINKAREV	Complete	5	LORENE BANKS	Complete
5004E9094B	ALESIA JACKSON	Complete	6	LEROY EARLE	Complete
D8576D76A5	ANDREY SHLOMOVICH	Complete	7	OREO BANKS	Complete
A918648630	ANITRA MURPHY	Complete	8	MICHELE RUSSO	Complete
1113BDD2E6	BRADDOCK BUCK DEANGELO	Complete	9	LEROY D EARLE III	Complete
0A5BDF6236	BRYAN MURPHY	Complete	10	DENISE INGRAM	Complete
F6CEFE734	CAMERON CORNELISON	Complete	11	LORENE BANKS	Complete
2C3D6535C6	CHARLES JACKLIN	Complete	12	LINDA K LAM	Complete
745706D41	CHARLES RICHARDSON	Complete	13	LISA K LAM	Complete
2D675464D7	CHRISTOPHER GALBRAITH	Complete	14	CAROLYN BARBEE	Complete
7D1F2D7B47	DEANGELO BRADDOCK	Complete	15	CLAUDIA ANDERSEN	Complete
F16BF035C1	DOREEN M CAQUETTE	Complete	16	MICHEAL T SHEPHERD	Complete
04AED75C43	DWAYNE HAWKINS-LODGE	Complete	17	KANEICE L STACKHOUSE	Complete
CAD886200A	EMANUEL HAJEK	Complete	18	CELESTE Y SCHADE	Complete
EBCCE4518F	GARY RICHARDSON	Complete	19	JAMES E HOUSTON	Complete
C111B7C04C	GEROD GREEN	Complete	20	JAMES L HATCHER	Complete
DC5A7CED01	GLENDA JOHNSON	Complete	21	JENNIFER M LONG	Complete
485D8F69EA	GLENNA O'DELL	Complete	22	KALYNA F JACKSON	Complete
97A52D8C4A	JAMES COBB	Complete	23	ANITA M JORDAN	Complete
37D5FC861D	JAMES L NELSON JR	Complete	24	MICHEAL T GOLDSTEIN	Complete
9E12FA2824	JAMES WALTON	Complete	26	BRENDA GRIMES	Complete
1B3A58CE36	JENNIFER SIMONIAN	Complete	27	KEESHIA WHITESIDE JAYNES	Complete
18C456CD80	JESSICA BROWN	Complete	28	MEGAN J MOORE	Complete
8A3F6127C0	JESSICA BROWN	Complete	29	ANTHONY H BALL	Complete
C5179FA632	JESSICA BROWN	Complete	31	MICHELLE G SETTLES	Complete
E623AA70EB	KAREN FENNESSEY	Complete	32	JIM SHANNON	Complete
264767730C	KIN WAH KUNG	Complete	33	TYEISHA HARRIS	Complete
344DC93545	MARIA ZAPOLSKI	Complete	34	ANTONIO FORTSON	Complete
4E38C388EC	MARINA SHLOMOVICH	Complete	35	DEBBIE BELCHER	Complete
AD69E16E0C	MARY REPINE	Complete	36	KRYSTAL PATE	Complete
4E248D3080	MICHAEL BROWN	Complete	37	ANTWON AUSTIN	Complete
D5F1F7F5C4	MICHAEL BROWN	Complete	39	RACHEL K. NARR	Complete
A89FE75E77	MICHELLE SHLOMOVICH	Complete	40	ADAM E. HIPPI	Complete
E86A9EB8A0	MOHAMAD HAKKANI	Complete	41	KATHERINE A. WENZEL	Complete
22A8716654	PETRA HAYEK	Complete	42	MICHAEL A. PALUMBO	Complete
6F6B6BCB5A	PHYLLIS BYRD	Complete	38	DIANA L. ANGUS	Late
603EFF417A	RACHELLE REESE	Complete			
E52A4866E2	RICHARD HAYEK	Complete			
CF4B00E930	RONY YARDEN	Complete			
91F80D4144	SHARD MASON	Complete			
2F35BB7580	SHERONDA WILLIAMS	Complete			
2C50A485E7	SMITH TRATICA	Complete			
BC9C044FF3	SONJI LANGFORD	Complete			
6BE7BD15DD	STEPHANIE WARD	Complete			
D2791B6886	TODD DORDAN	Complete			
8E8E55C18E	TRATICA SMITH	Complete			
7FC1C49FA3	SONIA MARTINEZ	Late			
7CFF2C7A31	ROCCO A. CONFORTI JR	Late			
40AE9DB0CC	ROCCO A. CONFORTI JR	Late			
7CFF2C7A31	ROCCO A. CONFORTI JR	Late			
40AE9DB0CC	ROCCO A. CONFORTI JR	Late			
344F34B05A	SONIA MARTINEZ	Late			
342451F4E6	DANIEL FRANCO	Late			
7FC1C49FA3	SONIA MARTINEZ	Late			
342451F4E6	DANIEL FRANCO	Late			
2793CE6AFD	BIANCA M JOYAL	Late			
34904D73FB	CODY THOMSON-ESQUER	Late			

EXHIBIT 5

**THE U.S. DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re: Google, Inc. Cookie Placement
Consumer Privacy Litigation

Case No. 1:12-md-02358

OBJECTION TO THE SETTLEMENT

The objector, Dmitrii Mudrechenko, disagrees that the proposed settlement is fair, reasonable and adequate. The objector requests the settlement should not be approved as fair, reasonable, and adequate and, in accordance with the settlement's terms; and class counsel's application for attorneys' fees and expenses should be denied.

This objection is filed on his behalf and on behalf of all class members. Dmitrii Mudrechenko is of legal age, a valid class member, a "U.S. consumer" along with being a resident of the State of Minnesota and he wrote this objection himself. In 2011 the objector used the Apple Safari web browser and visited a website from which Doubleclick.net (Google's advertising serving service) cookies were placed. The objector chose to block all cookies from "third parties and advertisers" and visited a non-Google website containing an advertisement served by Doubleclick.net (Google's advertising serving service) and did not already have a cookie from the Doubleclick.net domain but received one as a result of this visit because of means employed by Google to set cookies under these circumstances. He therefore is a valid class member and has standing to object. This objection is made in good faith. The sole purpose of this objection is to benefit class members.

The objector believes the settlement does not directly benefit class members. The \$5,500,000 total sum that Google will pay in connection with this settlement, will not be distributed to class members. In fact, there are no monetary benefits at all available to class members. Therefore, this settlement is not fair, reasonable, or adequate. The goal of this objection is to obtain greater compensation

for class members. The objector believes that a significant portion of the fund should be distributed to the class members instead. Attorneys representing plaintiffs argue that no direct monetary payments to class members are based on the difficulty in determining distribution of funds to such a large class. However, in class action lawsuit settlements, it is a well-known practice to establish a website that allows the class members to file a claim themselves and do it electronically. Therefore, claims can be filed fast and efficiently. Providing the class members with tools to file the claim electronically and advertising it on well known class action lawsuits news outlets and forums will ultimately resolve attorneys' concern about difficulty in determining class members.

In addition, the attorneys' fees represent an undue proportion of the fund. Attorneys' fees in the amount of \$1,925,000 are excessive. The fact that the settlement provides approximately \$2 million in attorneys' fees and nothing for the class members is unfair. Similar case occurred in *Chapman v. Tristar Products, Inc.* In *Tristar*, the Arizona Attorney General lodged an objection in the District Court to the terms of the settlement involving allegedly defective pressure cookers. The settlement agreement, entered after the first day of trial, which the Sixth Circuit characterized as "not going well for plaintiffs," provided for approximately \$2 million in attorneys' fees and costs and "substantially less than that—primarily in the form of coupons—for the class members." In *In re Google Inc. Cookie Placement Consumer Privacy Litigation* attorneys are also receiving close to \$2 million in attorneys' fees, but the class members are not receiving even a coupon or google electronic voucher. In fact, *In re Google Inc. Cookie Placement Consumer Privacy Litigation* represents the worst possible award for class members, that is absolute zero.

This objection was mailed to the administrator on 6/30/2022 by prepaid, first class, certified, return receipt mail.

I certify under penalty of perjury of the United States that all of the above is true and accurate to the best of my knowledge.



Dmitrii Mudrechenko, Pro se objector, 3155 Bluestem Drive, Unit 134, West Fargo, ND, 58078

E: d.mudrechenko@gmail.com P: 701-404-3302 June 30, 2022

Dmitrii Mudrechenko
3155 Bluestem Dr, #134
West Fargo, ND 58078



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43017

U.S. POSTAGE PAID
FCM LETTER
56537
JUN 29, 22
AMOUNT
\$6.80

R2304E104719-07



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL



0022 0410 0002 7922 5931

In Re: google cookie Placement Settlement
Administrator

c/o GCG
P.O. Box 10320
Dublin, OH

43017-032020

43017-5920
43017-032020

**RETURN RECEIPT
REQUESTED**